

EXHIBIT 7

1 ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
 Roman M. Silberfeld, Bar No. 62783
 2 RMSilberfeld@rkmc.com
 Bernice Conn, Bar No. 161594
 3 Bconn@rkmc.com
 David Martinez, Bar No. 193183
 4 DMartinez@rkmc.com
 2049 Century Park East, Suite 3400
 5 Los Angeles, CA 90067-3208
 Telephone: 310-552-0130
 6 Facsimile: 310-229-5800

7 Attorneys for Plaintiffs

8 BEST BUY CO., INC.; BEST BUY PURCHASING
 LLC; BEST BUY ENTERPRISE SERVICES, INC.;
 9 BEST BUY STORES, L.P.; BESTBUY.COM, LLC;
 MAGNOLIA HI-FI, INC.

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA

13 IN RE: CATHODE RAY TUBE (CRT)
 14 ANTITRUST LITIGATION

15 This Document Relates to
 Individual Case No. 3:11-cv-05513-SC

Master File No. M:07-5994-SC
 MDL No. 1917

Case No. 3:11-cv-05513-SC

16 BEST BUY CO., INC.; BEST BUY
 17 PURCHASING LLC; BEST BUY
 ENTERPRISE SERVICES, INC.; BEST BUY
 18 STORES, L.P.; BESTBUY.COM, L.L.C.; and
 MAGNOLIA HI-FI, INC.,

19 Plaintiffs,

20 v.

21 HITACHI, LTD.; HITACHI DISPLAYS,
 22 LTD.; HITACHI AMERICA, LTD.; HITACHI
 ASIA, LTD.; HITACHI ELECTRONIC
 23 DEVICES (USA), INC.; SHENZHEN SEG
 HITACHI COLOR DISPLAY DEVICES,
 24 LTD.; IRICO GROUP CORPORATION;
 IRICO GROUP ELECTRONICS CO., LTD.;
 25 IRICO DISPLAY DEVICES CO., LTD.; LG
 ELECTRONICS, INC.; LG ELECTRONICS
 26 USA, INC.; LG ELECTRONICS TAIWAN
 TAIPEI CO., LTD.; LP DISPLAYS
 27 INTERNATIONAL LTD.;

28 (CONTINUED ON NEXT PAGE)

**BEST BUY'S RESPONSES TO
 THOMSON SA AND THOMSON
 CONSUMER ELECTRONICS,
 INC.'S FIRST SET OF REQUESTS
 FOR ADMISSION**

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

PANASONIC CORPORATION;
PANASONIC CORPORATION OF NORTH
AMERICA; MT PICTURE DISPLAY CO.,
LTD.; BEIJING
MATSUSHITA COLOR CRT CO., LTD.;
KONINKLIJKE PHILIPS ELECTRONICS
N.V.; PHILIPS ELECTRONICS NORTH
AMERICA CORPORATION; PHILIPS
ELECTRONICS INDUSTRIES (TAIWAN),
LTD.; PHILIPS DA AMAZONIA
INDUSTRIA ELECTRONICA LTDA.;
SAMTEL COLOR LTD.; THAI CRT CO.,
LTD.; TOSHIBA CORPORATION; TOSHIBA
AMERICA, INC.; TOSHIBA AMERICA
CONSUMER PRODUCTS, LLC; TOSHIBA
AMERICA ELECTRONIC COMPONENTS,
INC.; TOSHIBA AMERICA INFORMATION
SYSTEMS, INC.; CHUNGHWA PICTURE
TUBES, LTD.; CHUNGHWA PICTURE
TUBES (MALAYSIA); TATUNG COMPANY
OF AMERICA, INC.,

Defendants.

PROPOUNDING PARTIES: THOMSON SA AND
THOMSON CONSUMER ELECTRONICS, INC.

RESPONDING PARTY: BEST BUY CO., INC.; BEST BUY PURCHASING
LLC; BEST BUY ENTERPRISE SERVICES, INC.;
BEST BUY STORES, L.P.; BESTBUY.COM, L.L.C.;
and MAGNOLIA HI-FI, INC.

SET NO.: FIRST

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Best
Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc., Best Buy
Stores, L.P.; BestBuy.Com, L.L.C.; and Magnolia HI-FI, Inc. (collectively "Best Buy")
hereby Object and Respond to Defendant Thomson SA and Thomson Consumer
Electronics, Inc.'s First Set of Requests for Admission (hereinafter, the "Requests for
Admission").

RESERVATIONS OF RIGHTS

1 In responding to these Requests for Admission, Best Buy states that it has
 2 conducted, or will conduct, a diligent search, reasonable in scope, for information that is
 3 relevant to the Requests for Admission. In the event that additional information relevant
 4 to the Requests for Admission is later identified or brought to Best Buy's attention, Best
 5 Buy reserves the right to amend, revise, supplement, modify, or clarify the following
 6 objections and responses. Best Buy further reserves the right to complete its
 7 investigation and discovery of the facts, and to rely at trial or in other proceedings upon
 8 information in addition to the information provided herein, regardless of whether such
 9 information is newly discovered or newly in existence.

10 Best Buy incorporates by reference the evidence identified by the Direct Purchaser
 11 Plaintiffs, Indirect Purchaser Plaintiffs, and the other Direct Action Plaintiffs in response
 12 to Defendants' discovery requests in accordance with the Special Master's Contention
 13 Discovery Order.

14 Best Buy has responded to these Requests for Admission as it interprets and
 15 understands them. If Defendants subsequently assert an interpretation of any Request
 16 for Admission or response that differs from Best Buy's understanding, Best Buy reserves
 17 the right to supplement or amend its objections or responses.

18 Best Buy reserves the right to object to the admission of its responses to the
 19 Requests for Admission into evidence at trial, or any other proceeding.

20 GENERAL OBJECTIONS

21 1. Best Buy reserves all evidentiary objections and rights under the Federal
 22 Rules of Evidence.

23 2. Best Buy reserves the right to make use of or introduce at any hearing or trial
 24 information responsive to Thomson's Requests for Admission but discovered after the
 25 date of this response.

26 3. Best Buy objects to the Requests for Admission on the ground that they are
 27 premature. Best Buy's investigation of this case is ongoing and discovery in this matter
 28 remains open until at least September 5, 2014. These responses are being made after

1 reasonable inquiry into the relevant facts, and are based only upon the information and
2 documentation that is presently known to Best Buy. Further investigation and discovery,
3 including the upcoming Rule 30(b)(6) depositions of Thomson in MDL No. 1917, may
4 result in the identification of additional information, and Best Buy reserves the right to
5 modify their responses. Best Buy's responses should not be construed to prejudice their
6 right to conduct further investigation in this case, or to limit their use of any additional
7 evidence that may be developed.

8 4. Best Buy objects to the Requests for Admission to the extent that they seek
9 any information that is protected from discovery based on the attorney-client privilege,
10 the work product doctrine, or any other privilege or immunity (collectively "Privilege").
11 Best Buy does not intend by its answers to the Requests for Admission to waive any
12 Privilege.

13 5. Best Buy objects to the Requests for Admission to the extent they seek
14 information that is neither relevant to this litigation, nor reasonably calculated to lead to
15 the discovery of admissible evidence.

16 6. Best Buy objects to the Requests for Admission to the extent that they are
17 unintelligible, vague, ambiguous, overly broad, unduly burdensome, and oppressive or
18 in any way broader in scope than any limitations Defendants asserted in responding to
19 the multiple discovery requests already propounded in the consolidated *Cathode Ray*
20 *Tube (CRT) Antitrust Litigation* ("MDL No. 1917").

21 7. Best Buy objects to the Requests for Admission to the extent that they
22 prematurely call for expert work, expert opinions, expert reports, or expert testimony.
23 Best Buy will provide expert disclosures as provided by the Federal Rules of Civil
24 Procedure.

25 8. Best Buy objects to the Requests for Admission to the extent that they call
26 for speculation or call for a conclusion on an issue of law.

27 9. Best Buy objects to, and expressly disclaims, any need or intent to prove any
28 fact listed here as a prerequisite to proving its claims at trial.

1 10. Best Buy reserves its right to try their case as they determine is best at trial.
2 This includes by not using facts or information stated in this Response or using facts or
3 information in addition to those stated in this Response.

4 11. Best Buy objects to these Requests for Admission to the extent that they
5 demand actions beyond those set forth in the Federal Rules of Civil Procedure, the
6 Local Rules of the Northern District of California, the Order re Discovery and Case
7 Management Protocol entered on April 3, 2012 in MDL No. 1917 (the "Discovery and
8 Case Management Protocol"), or any applicable order of this Court.

9 12. Best Buy reserves the right to object to and/or challenge any evidence on
10 grounds of competency, relevance, materiality, privilege, or admissibility at trial or at
11 any hearing or proceeding with respect to any admissions sought by these Requests for
12 Admission and all responses to these Requests for Admission.

13 13. Best Buy's Responses to these Requests for Admission are subject to the
14 provisions of the Stipulated Protective Order that the Court entered on June 18, 2008
15 (the "Protective Order") in MDL No. 1917. Best Buy's Responses are hereby designated
16 "Highly Confidential" in accordance with the provisions of the Protective Order. To
17 the extent that the Protective Order does not apply, Best Buy objects to the Requests for
18 Admission to the extent that they seek information that would disclose proprietary
19 information, trade secrets, or other confidential research, development, or other
20 confidential information, protected by the Uniform Trade Secrets Act, among others,
21 any and all rights of privacy under the United States Constitution or Article I of the
22 Constitution of the State of California, or any other applicable law or state constitution,
23 or that is otherwise prohibited from disclosure because to do so would cause Best Buy
24 to violate legal and/or contractual obligations to any other persons or entities.

25 14. Best Buy objects to the Requests for Admission to the extent they contain
26 any incidental or implied admission of fact or law. Best Buy's Responses to all or any
27 part of any Request should not be taken as an incidental or implied admission,
28 agreement, or concurrence that: (i) Best Buy accepts or admits an express or implied

1 assumption of fact set forth in or assumed by the Request; (ii) Best Buy accepts or
2 admits any express or implied assumption of law set forth in or assumed by the
3 Request; (iii) Best Buy has in its possession, custody, or control documents or
4 information responsive to that Request; or (iv) documents or information responsive to
5 that Request exist.

6 Best Buy objects to the Requests for Admission in their entirety on the above
7 grounds. In order to avoid repetition, the foregoing General Objections are hereby
8 incorporated into each response as if set forth therein.

9 OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSION

10 Request for Admission No. 1:

11 Admit that You have no Evidence that Thomson SA manufactured or sold CDTs
12 during the Relevant Period.

13 Response:

14 Best Buy refers to and incorporates its General Objections as if fully restated here.
15 Best Buy further objects to this Request on the grounds that: (i) it is overly broad,
16 unduly burdensome, and premature as it requires Best Buy to review and analyze all
17 information obtained in discovery thus far and state their entire case on an incomplete
18 record; (ii) it seeks information that is in Thomson's possession, custody, or control, and
19 that has not yet been provided to Best Buy; (iii) it seeks information that is the subject of
20 ongoing discovery and investigation; (iv) it seeks information that is equally available to
21 Thomson; and (v) it seeks, in contravention of well-established legal principles, to
22 dismember the overall conspiracy to focus on its separate parts, instead of looking at it
23 as a whole, *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
24 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
25 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)), and improperly seeks "to
26 carve the alleged conspiracy into a number of mini-conspiracies." *In re TFT-LCD (Flat*
27 *Panel) Antitrust Litigation*, Master Docket No. M:07-1827-SI, Order Denying Defendants'
28 *Motions for Partial Summary Judgment Regarding Production and Capacity*, Docket No.

1 4097, at 1-2.

2 Subject to and without waiving the foregoing objections, Best Buy admits this
3 Request. Best Buy reserves the right to supplement its response to this Request for
4 Admission based on further discovery, investigation, expert work, or other
5 developments in this case.

6 **Request for Admission No. 2:**

7 Admit that You have no Evidence that Thomson SA manufactured or sold CDT
8 Products during the Relevant Period.

9 **Response:**

10 Best Buy refers to and incorporates its General Objections as if fully restated here.
11 Best Buy further objects to this Request on the grounds that: (i) it is overly broad,
12 unduly burdensome, and premature as it requires Best Buy to review and analyze all
13 information obtained in discovery thus far and state their entire case on an incomplete
14 record; (ii) it seeks information that is in Thomson's possession, custody, or control, and
15 that has not yet been provided to Best Buy; (iii) it seeks information that is the subject of
16 ongoing discovery and investigation; (iv) it seeks information that is equally available to
17 Thomson; and (v) it seeks, in contravention of well-established legal principles, to
18 dismember the overall conspiracy to focus on its separate parts, instead of looking at it
19 as a whole, *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
20 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
21 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)), and improperly seeks "to
22 carve the alleged conspiracy into a number of mini-conspiracies." *In re TFT-LCD (Flat*
23 *Panel) Antitrust Litigation*, Master Docket No. M:07-1827-SI, Order Denying Defendants'
24 Motions for Partial Summary Judgment Regarding Production and Capacity, Docket No.
25 4097, at 1-2.

26 Subject to and without waiving the foregoing objections, Best Buy admits this
27 Request. Best Buy reserves the right to supplement its response to this Request for
28 Admission based on further discovery, investigation, expert work, or other

1 developments in this case.

2 **Request for Admission No. 3:**

3 Admit that You have no Evidence that Thomson Consumer manufactured or sold
4 CDTs during the Relevant Period.

5 **Response:**

6 Best Buy refers to and incorporates its General Objections as if fully restated here.
7 Best Buy further objects to this Request on the grounds that: (i) it is overly broad,
8 unduly burdensome, and premature as it requires Best Buy to review and analyze all
9 information obtained in discovery thus far and state their entire case on an incomplete
10 record; (ii) it seeks information that is in Thomson's possession, custody, or control, and
11 that has not yet been provided to Best Buy; (iii) it seeks information that is the subject of
12 ongoing discovery and investigation; (iv) it seeks information that is equally available to
13 Thomson; and (v) it seeks, in contravention of well-established legal principles, to
14 dismember the overall conspiracy to focus on its separate parts, instead of looking at it
15 as a whole, *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
16 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
17 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)), and improperly seeks "to
18 carve the alleged conspiracy into a number of mini-conspiracies." *In re TFT-LCD (Flat*
19 *Panel) Antitrust Litigation*, Master Docket No. M:07-1827-SI, Order Denying Defendants'
20 Motions for Partial Summary Judgment Regarding Production and Capacity, Docket No.
21 4097, at 1-2.

22 Subject to and without waiving the foregoing objections, Best Buy admits this
23 Request. Best Buy reserves the right to supplement its response to this Request for
24 Admission based on further discovery, investigation, expert work, or other
25 developments in this case.

26 **Request for Admission No. 4:**

27 Admit that You have no Evidence that Thomson Consumer manufactured or sold
28 CDT Products during the Relevant Period.

Response:

Best Buy refers to and incorporates its General Objections as if fully restated here. Best Buy further objects to this Request on the grounds that: (i) it is overly broad, unduly burdensome, and premature as it requires Best Buy to review and analyze all information obtained in discovery thus far and state their entire case on an incomplete record; (ii) it seeks information that is in Thomson's possession, custody, or control, and that has not yet been provided to Best Buy; (iii) it seeks information that is the subject of ongoing discovery and investigation; (iv) it seeks information that is equally available to Thomson; and (v) it seeks, in contravention of well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole, *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)), and improperly seeks "to carve the alleged conspiracy into a number of mini-conspiracies." *In re TFT-LCD (Flat Panel) Antitrust Litigation*, Master Docket No. M:07-1827-SI, Order Denying Defendants' Motions for Partial Summary Judgment Regarding Production and Capacity, Docket No. 4097, at 1-2.

Subject to and without waiving the foregoing objections, Best Buy admits this Request. Best Buy reserves the right to supplement its response to this Request for Admission based on further discovery, investigation, expert work, or other developments in this case.

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

1 DATED: September 5, 2014

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

2
3 By: /s/ Laura E. Nelson

Roman M. Silberfeld

4 David Martinez

Laura E. Nelson

5 ATTORNEYS FOR PLAINTIFFS
6 BEST BUY CO., INC.; BEST BUY
7 PURCHASING LLC; BEST BUY ENTERPRISE
8 SERVICES, INC.; BEST BUY STORES, L.P.;
9 BESTBUY.COM, LLC; MAGNOLIA HI-FI,
10 INC.
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